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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

MARIA BRIDENBAUGH, Individually; and  
JOHN BRIDENBAUGH, Individually;

Plaintiffs,

v.

FORD MOTOR COMPANY, a Delaware  
Corporation; DOES 1 Through 20; and ROE  
BUSINESS ENTITIES 1 Through 20,

Defendants.

CASE NO.: 2:24-cv-00188-GMN-BNW

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(Second Request)**

**STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES**  
**(Second Request)**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs MARIA BRIDENBAUGH and JOHN BRIDENBAUGH and Defendant FORD MOTOR COMPANY, by, and through their respective undersigned counsel of record, pursuant to LR II 26-3, that discovery and related deadlines be extended. This is the Parties' **Second Request** for a continuance of discovery deadlines.

**I. Discovery Completed to Date:**

This matter involves an incident that occurred on November 21, 2021, when Plaintiff MARIA BRIDENBAUGH alleges that she suffered serious burns from the heated seats in her 2010 Lincoln Town Car. Discovery completed to date includes the following:

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- a. Plaintiffs' Complaint was filed on November 20, 2023;
- b. Defendant filed an Answer to the Complaint on January 26, 2024;
- c. The Parties held a FRCP 26(f) Conference on February 21, 2024;
- d. The Parties filed a Joint Status Report on February 29, 2024;
- e. Defendant served their Initial Disclosure of Witnesses and Documents on March 6, 2024;
- f. Defendant conducted an inspection of the subject vehicle on March 13, 2024;
- g. The Parties filed a Joint Discovery Plan and Scheduling Order on March 14, 2024;
- h. Plaintiffs served their Initial Disclosure of Witnesses and Documents on March 14, 2024;
- i. Defendant propounded their First Set of Interrogatories to Plaintiffs JOHN and MARIA on April 3, 2024, and Plaintiffs responded on May 6, 2024;
- j. Defendant propounded their First Set of Requests for Production to Plaintiffs JOHN and MARIA on April 3, 2024, and Plaintiffs responded on May 8, 2024;
- k. Plaintiffs served their First Supplemental Disclosures on May 8, 2024;
- l. Plaintiffs propounded their First Set of Requests for Production and First Set of Interrogatories on May 23, 2024, and Defendant responded on June 24, 2024;
- m. Defendant served their First Supplemental Disclosures on June 5, 2024;
- n. Plaintiffs served their Second Supplemental Disclosures on June 7, 2024;
- o. Defendant served their Second Supplemental Disclosures on July 17, 2024;
- p. Defendant served their Third Supplemental Disclosures on July 19, 2024;
- q. Plaintiff MARIA BRIDENBAUGH's deposition was taken on July 22, 2024;
- r. Plaintiff JOHN BRIDENBAUGH's deposition was taken on July 23, 2024;
- s. Defendant served their Fourth Supplemental Disclosures on September 17, 2024;
- t. Plaintiff propounded their Second Set of Requests for Production and Second Set of Interrogatories on October 17, 2024;
- u. Defendant served their Fifth Supplemental Disclosures on November 8, 2024;
- v. Plaintiffs served their Fourth Supplemental Disclosures on November 12, 2024;
- w. Plaintiffs disclosed their experts on November 12, 2024;

- x. Plaintiffs served their Fifth Supplemental Disclosures on November 25, 2024;
- y. Defendant responded to Plaintiffs' Second Set of Requests for Production and Second Set of Interrogatories on December 2, 2024;
- z. The deposition of Defendant's FRCP 30(b)(6) representative was taken on December 11, 2024;
- aa. Defendant disclosed their experts on December 13, 2024;
- bb. Plaintiff propounded their Third Set of Requests for Production and First Set of Requests for Admission on December 19, 2024;
- cc. Plaintiff propounded their Second Set of Requests for Admission on December 20, 2024;

**II. Discovery that Remains to be Completed:**

- a. Obtain, disclose and evaluate additional medical and billing records and new medical providers of Plaintiff MARIA regarding her ongoing medical treatment;
- b. Supplement written discovery as appropriate;
- c. Supplement expert opinions as appropriate;
- d. Take depositions of additional Defendant Ford's FRCP 30(b)(6) representatives, employees and/or percipient witnesses;
- e. Propound additional discovery, if necessary;
- f. Take the depositions of Plaintiffs' experts;
- g. Take the depositions of Defendant's experts;
- h. Take the depositions of Plaintiff's treating doctors, as necessary;
- i. Additional discovery yet to be determined as may be necessary.

**III. Reasons Why the Parties are Requesting Extension:**

The parties have diligently worked to meet the current deadlines on this products' liability case. Discovery is ongoing and the parties are cooperating in good faith. As a result of Defendant's disclosures, the parties have learned that multiple non-parties, including Lear, Kostal, Gentherm, and Johnson Controls, were responsible for designing, manufacturing, testing, and/or supplying the parts of the subject seat heater system that are at issue in this litigation, and that many of these records

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1 are purportedly not in the possession of Defendant Ford. Ford is not in possession of and thus has  
2 been unable to disclose many of the records requested by Plaintiffs, and the parties have reason to  
3 believe that these records may be in the possession of the suppliers identified above. Plaintiff has  
4 severed various subpoenas and the parties have diligently worked together to obtain records and  
5 schedule depositions. However, given the complexities of the case, the necessity to update the  
6 parties' Stipulated Protective Order, and having learned about additional suppliers, coordinating and  
7 scheduling the depositions during the remaining discovery period cannot be achieved. Further, the  
8 information acquired from this and other sources will need to be reviewed and analyzed by plaintiffs'  
9 experts and may well lead to further discovery. This necessitates extending the expert deadline as  
10 well.

11 Additionally, as a paraplegic who suffered serious burns, Plaintiff MARIA's medical  
12 treatment is ongoing and has recently substantially changed. Her burn wounds have reopened,  
13 requiring further treatment and causing her to once again become bed bound. Treatment and  
14 recovery are ongoing, and plaintiffs are still in the process of obtaining medical records and bills.  
15 An issue in this case is the extent and cost of future medical expenses, as well what are the future  
16 general damages, and this ongoing and updated medical information will assist the parties in that  
17 evaluation. New medical providers will be identified for this new medical treatment. The parties  
18 seek to gather, disclose and evaluate the entirety of plaintiffs' claimed damages, including past,  
19 current and future condition and economic loss and expense.

20 The parties agree that good cause justifies moving the current deadlines six (6) months to  
21 afford the parties sufficient time to gather and analyze evidence and possibly discuss settlement  
22 before incurring otherwise avoidable expenses and the Court's time. Accordingly, the Parties  
23 request a six (6) month extension of the current discovery deadlines in order to acquire and review  
24 all anticipated materials.

25 The Parties make this request to the Court in good faith and not for the purpose of delay. The  
26 parties propose deadlines for a six (6) month extension as set forth below.

**IV. Proposed Discovery Schedule:**

The parties propose the following discovery deadlines:

<u>Discovery</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Initial Expert Disclosures (Plaintiffs)	November 12, 2024	No change
Initial Expert Disclosures (Defendant)	December 13, 2024	No change
Add Parties/Amend Pleadings	November 12, 2024	May 12, 2025
Rebuttal Expert Disclosures	January 10, 2025	July 10, 2025
Close of Discovery	February 11, 2025	August 11, 2025
Dispositive Motions	March 13, 2025	September 12, 2025
Joint Pretrial Order	April 12, 2025	October 13, 2025

IT IS SO AGREED AND STIPULATED, THROUGH COUNSEL OF RECORD.

Dated this 30<sup>th</sup> day of December 2024.

Dated this 30<sup>th</sup> day of December 2024.

**BERTOLDO CARTER SMITH &  
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**SNELL & WILMER, LLP**

/s/ Cliff W. Marcek

/s/ Dawn L. Davis

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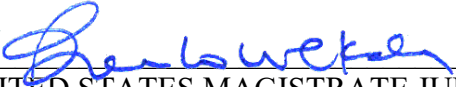
*John Bridenbaugh*

*Bridenbaugh v. Ford Motor Company.*  
Case No.: 2:24-cv-00188-GMN-BNW  
Second Requested Stipulation and Order to Extend  
Discovery Deadlines

**ORDER**

IT IS SO ORDERED.

Dated: January 2, 2025

  
UNITED STATES MAGISTRATE JUDGE

Respectfully Submitted By:

/s/ Cliff W. Marcek, Esq.

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